

---

---

**PREPARATION FOR SETTLEMENT CONFERENCE**

---

---

In preparation for the scheduled settlement conference, the attorneys for each party should submit a settlement letter to Judge Beckerman (not to exceed five pages), addressing these points:

1. A brief summary of the key claims, counterclaims (if any), and cross-claims (if any).
2. The three best and three worst facts for your case.
3. Any legal issues which, when ruled upon, could substantially change your client's position in the case, either favorably or unfavorably.
4. An explanation of any factors making settlement difficult for the parties.
5. Any common goals that might facilitate settlement.
6. The status of settlement negotiations, including the last settlement proposal made by each party.
7. The fees and costs you have incurred to date, and an estimate of the anticipated fees and costs you will incur to prepare, try, and participate in an appeal of the case.
8. A reasonable and realistic settlement proposal that you believe is fair.

You may attach key exhibits, reasonable in number and length, such as documents constituting the alleged contract, letters or e-mails that contain an alleged admission, and similar documents, if the exhibits are critical to understanding the case or the parties' respective positions.

In addition, please bring to the settlement conference (or e-mail to Judge Beckerman in advance of the conference), an electronic copy of a draft settlement agreement that leaves appropriate space for those settlement terms that remain to be negotiated.

All communications made in connection with the settlement conference are confidential. Please be candid in your settlement letter.

These documents must be submitted to chambers by 5:00 p.m. on **Monday, September 7, 2015**, via e-mail to: **stacie\_beckerman@ord.uscourts.gov**.

Please call Courtroom Deputy Giselle Williams, at 503-326-8022, if you have any questions.

Thank you for your cooperation in this matter.

Hon. Stacie F. Beckerman  
U.S. Magistrate Judge  
927 United States Courthouse  
1000 S.W. Third Avenue  
Portland, OR 97204